

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|-------------------------|---|-------------------|
| SECURITIES AND EXCHANGE |) | |
| COMMISSION, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. |
| |) | 1:12-cv-10012-MLW |
| |) | |
| v. |) | |
| |) | |
| RONALD BALDWIN, JR. |) | |
| |) | |
| Defendant. |) | |
| |) | |

**JOINT STATEMENT FOR
INITIAL SCHEDULING CONFERENCE**

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(D), the Securities and Exchange Commission (the “Commission”) and defendant Ronald Baldwin, Jr., hereby submit their Joint Statement, including their proposed pre-trial schedule for the conduct of discovery and the filing of dispositive motions in this matter, in anticipation of the initial scheduling conference to be held on April 16, 2013 at 3:15 p.m.

Matters to be Addressed at Conference

A. Obligation of Counsel to Confer

Counsel for the Commission and for Mr. Baldwin have conferred and hereby advise the Court as follows:

1. Agenda of Matters to be Discussed.

The Commission and Mr. Baldwin have been engaged in extended settlement discussions. A likely proposed settlement involves the submission of detailed financial information by Mr. Baldwin, which is ongoing.

2. Proposed Pretrial Schedule.

- | | |
|---|-------------------|
| a. End of Fact Discovery | October 18, 2013 |
| b. Expert Disclosure (Fed. R. Civ. P. 26(a)(2) | November 1, 2013 |
| c. Rebuttal Expert Disclosure | November 15, 2013 |
| d. End of Expert Discovery | December 20, 2013 |
| e. Deadline for Submission of Motions for Summary Judgment | February 7, 2014 |

3. Consent to Trial By Magistrate Judge

The parties are willing to consent to trial by a magistrate judge.

B. Settlement Proposal

The Commission has communicated a written settlement proposal to Mr. Baldwin.

C. Discovery Events

With regard to the limitations on discovery events set forth in Local Rule 26.1(C), neither the Commission nor Mr. Baldwin anticipates needing to exceed the default limit of ten depositions. No other discovery issues currently are foreseen.

D. Status of Initial Disclosures

None of the parties has served initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A).

E. Alternative Dispute Resolution

No agreement has been made at this time for consent to alternative dispute resolution.

G. Local Rule 16.1(D)(3) Certifications

The Commission's certification pursuant to Local Rule 16.1(D)(3) is being submitted with this Joint Statement.

April 9, 2013

Respectfully submitted,

Plaintiff:

//s// Martin F. Healey

Martin F. Healey (BBO No. 227550)
U.S. SECURITIES AND EXCHANGE
COMMISSION
33 Arch Street; 23rd Floor
Boston, Massachusetts 02110-1424
617-573-8952
HealeyM@sec.gov

Counsel for Plaintiff
Securities and Exchange Commission

Defendant:

/s/ Ralph V. De Martino
Ralph V. De Martino
Schiff Hardin LLP
901 K Street NW, Suite 700
Washington DC 20001
202-724-6848
Rdemartino@schiffhardin.com

*Counsel for Defendant
Ronald Baldwin, Jr.*

CERTIFICATE OF SERVICE

I, Martin F. Healey, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to any indicated as non-registered participants on this date.

Date: April 9, 2013

//s// Martin F. Healey
Martin F. Healey